

1 THAD A. DAVIS (SBN 220503)
thad.davis@ropesgray.com
2 ROCKY C. TSAI (SBN 221452)
rocky.tsai@ropesgray.com
3 ROPES & GRAY LLP
4 Three Embarcadero Center, Ste 300
5 San Francisco, California 94111-4006
Tel: (415) 315- 6300
Fax: (415) 315-6350

6 HARVEY J. WOLKOFF
7 harvey.wolkoff@ropesgray.com
8 MARK P. SZPAK
9 mark.szpak@ropesgray.com
10 LARA A. ORAVEC
11 lara.oravec@ropesgray.com
12 ROPES & GRAY LLP
13 Prudential Tower, 800 Boylston Street
14 Boston, MA 02199-3600
15 Tel: (617) 951-7606
16 Fax: (617) 235-0215

12 || Attorneys for Defendants

13

17

18 RYAN ROMAINE, JUAN A. GARCIA,
19 individually, on behalf of themselves and others
similarly situated,

20

Plaintiffs,

21

22

SONY COMPUTER ENTERTAINMENT
AMERICA LLC, and SONY NETWORK
ENTERTAINMENT INTERNATIONAL LLC.

24

Defendants.

25

26

27

28

Case No. 3:11-cv-02180-EMC

**STIPULATION TO EXTEND
TIME FOR DEFENDANTS TO
MOVE, ANSWER, OR
OTHERWISE RESPOND TO
COMPLAINT**

Judge: Magistrate Judge Edward M. Chen

STIPULATION TO EXTEND TIME FOR DEFENDANTS TO
RESPOND TO COMPLAINT
CASE No. 3:11-cv-02180-EMC

1 WHEREAS, defendants Sony Computer Entertainment America LLC (“SCEA”) and
2 Sony Network Entertainment International LLC (“SNEI”) have been named as defendants in at
3 least twenty-one (22) putative class action lawsuits within this District, to date;

4 WHEREAS, certain of the Sony Defendants have also been named as defendants in at
5 least eighteen (18) putative class action lawsuits pending outside this District, to date;

6 WHEREAS, a motion is currently pending before the Judicial Panel on Multidistrict
7 Litigation (the “JPML”) to centralize this and other matters, to which one response has been filed
8 to date, and as to which other responses, including Sony Defendants’ response, are due by June 2,
9 2011.

10 WHEREAS, the current deadline for SCEA and SNEI to respond to the Complaint is July
11 18, 2011;

12 WHEREAS, the parties have agreed to the extension of time herein for the defendants in
13 the above-captioned action to move, answer, or otherwise respond to the Complaint, in order to
14 facilitate the scheduling of this matter in coordination with the schedule for the motion before the
15 JPML;

16 NOW, THEREFORE, pursuant to Civil Local Rules 6-1(a), 7-1(a), and 7-12, all parties,
17 by and through their respective counsel, hereby stipulate as follows:

18 The deadline for the defendants to respond to the Complaint in the above-captioned action
19 is extended until and including 30 days after a consolidated complaint is filed in a multidistrict
20 litigation centralizing the above-captioned action with other matters, or if centralization is denied
21 by the JPML, then 30 days from the date of such order denying centralization.

22 ///

23

24

25

26

27

28

Either party may seek ex parte relief from this stipulated Order for good cause shown, including, but not limited to, Defendants' filing of a responsive pleading in a related case.

Dated: May 20, 2011

By: /s/ Michael Francis Ram /s/ [as authorized]
Michael Francis Ram
RAM, OLSON, CEREGHINO &
KOPCZYNSKI LLP

Attorneys for Plaintiffs
RYAN ROMAINE
JUAN A GARCIA

Dated: May 20, 2011

HARVEY WOLKOFF
THAD A. DAVIS
ROCKY C. TSAI
ROPES & GRAY LLP

By: /s/ Rocky C. Tsai /s/
Rocky C. Tsai

Attorneys for Defendants
SONY COMPUTER ENTERTAINMENT
AMERICA LLC, and SONY NETWORK
ENTERTAINMENT INTERNATIONAL
LLC

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 7/12/11

By: Rick Sehner
U. S. District Court Magistrate Judge